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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

| | | |
|--|---|-----------------------------|
| ELECTRONIC FRONTIER FOUNDATION, |) | |
| |) | Case No.: 4:09-cv-03351-SBA |
| Plaintiff, |) | |
| |) | Stipulation |
| v. |) | |
| |) | No hearing requested |
| CENTRAL INTELLIGENCE AGENCY, <i>et al.</i>, |) | |
| |) | |
| Defendants. |) | |

The parties to this action, through their undersigned counsel, have conferred and have reached an agreement with respect to a partial modification of the current deadlines, as set forth in the Court's Order of February 19, 2014 [ECF No. 86], to comply with the Court's Order of September 30, 2013 [ECF No. 81].

Pursuant to this stipulation, the parties agree to partial modification of the current deadlines to comply with the Court's Order of September 30, 2013, as follows:

1. Defendant the Department of Defense shall release to Plaintiff the information that the Court has not determined was properly withheld or serve Plaintiff with a satisfactory supplemental *Vaughn* index and declaration by no later than March 25, 2014.

2. Defendant the Department of Justice, specifically its component the Federal Bureau of Investigation, shall release to Plaintiff the information that the Court has not determined was properly withheld or serve Plaintiff with a satisfactory supplemental *Vaughn* index and declaration by no later than April 4, 2014.

3. In the event the parties are unable to resolve their disputes regarding any withheld information, the parties must submit the stipulation required by the Court's Order of September 30, 2013, by no later than May 5, 2014.

Dated: March 20, 2014

Respectfully submitted,

/s/ Kathryn C. Davis
KATHRYN C. DAVIS (DC Bar #985055)
Counsel for Defendants

/s/ Jennifer Lynch
JENNIFER LYNCH (SBN 240701)
Counsel for Plaintiff

DECLARATION PURSUANT TO L.R. 5.1

I, Kathryn C. Davis, hereby declare that I have obtained Jennifer Lynch's concurrence in the filing of this document.

Executed at Washington, D.C. this 20th day of March, 2014.

* * * *

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: 3/21/2014


The Honorable SAUNDRA B. ARMSTRONG
United States District Judge

CERTIFICATE OF SERVICE

I hereby certify that on March 20, 2014, I electronically filed the foregoing document with the Clerk of the Court, using the CM/ECF system, which will send notification of such filing to the counsel of record in this matter who are registered on the CM/ECF system.

/s/ Kathryn C. Davis
KATHRYN C. DAVIS